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Attorneys for Defendants:  
AMERICAN EXPRESS COMPANY, AMERICAN  
EXPRESS BANK, LTD. and AMERICAN EXPRESS  
TRAVEL RELATED SERVICES COMPANY, INC.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X 21 MC 103 (AKH)

FREDDY PINZA,

Index No.: 07-CV-10486

Plaintiff(s),

**NOTICE OF ADOPTION OF ANSWER  
TO MASTER COMPLAINT**

-against-

**ELECTRONICALLY FILED**

THE CITY OF NEW YORK, TULLY  
CONSTRUCTION CO., INC., TULLY  
ENVIRONMENTAL INC., TULLY  
INDUSTRIES, INC., TURNER  
CONSTRUCTION COMPANY, BOVIS LEND  
LEASE, INC.,

Defendant(s).

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PLEASE TAKE NOTICE that Defendants, AMERICAN EXPRESS COMPANY, AMERICAN EXPRESS BANK, LTD and AMERICAN EXPRESS TRAVEL RELATED SERVICES COMPANY, INC., by their attorneys, McGIVNEY & KLUGER, P.C., as and for their Response to the allegations set forth in the Complaint by Adoption (Check-Off Complaint) Related to the Master Complaint filed in the above-referenced action, hereby adopt their Answer to Master Complaint dated July 31, 2007, which was filed in the matter of *In Re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 103 (AKH).

WHEREFORE, the defendants, AMERICAN EXPRESS COMPANY, AMERICAN EXPRESS BANK, LTD and AMERICAN EXPRESS TRAVEL RELATED SERVICES COMPANY, INC., demand judgment dismissing the above-captioned action as against them,

together with their costs and disbursements and for such other and further relief as this Court deems just and proper.

Dated: New York, New York  
January 10, 2008

Yours etc.,

McGIVNEY & KLUGER, P.C.  
Attorneys for Defendants  
AMERICAN EXPRESS COMPANY, AMERICAN  
EXPRESS BANK, LTD and AMERICAN  
EXPRESS TRAVEL RELATED SERVICES  
COMPANY, INC.

By: 

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